

Appendix A: More Information About Your Ordinary Personal Data

TYPE OF ORDINARY PERSONAL DATA HELD BY US	WHAT WE USE IT FOR	LEGAL GROUND	GUIDELINE RETENTION PERIOD
Biographical details (including name, title, contact details, DOB, gender, emergency contacts, photograph, fingerprint, recognition).	Administration of the contract, emergency contact details so we can look after your welfare in an emergency, gender for gender pay gap reporting, equal opportunities monitoring, HMRC, to avoid age discrimination, redundancy calculations, Internal PR efforts, i.e. CEO sends birthday cards photograph for ID badges and on intranet/web to help colleagues/customers/ security to identify you.	Legal obligation. Performance of the contract. In our legitimate interest to hold emergency contact details in order to inform a person nominated by you in an emergency situation. In our legitimate interest to use photographs to help colleagues/customers/ security to identify you.	During employment and up to 6 years after employment ends. Emergency contacts, photograph: during employment and up to 6 months after employment ends.
Recruitment information (including correspondence/references/routine screening for adverse media and or industry vulnerabilities (such as Social Responsibility and Harm Minimalisation factors)/ right to work checks and related documents).	Administration of the contract, to check and demonstrate compliance with statutory obligations, licensing conditions and the assurance that you have the legal right to work in the UK.	Legal obligation Performance of the contract In our legitimate interest to maintain relevant and appropriate records of recruitment for business administration and administration of your employment	During employment and up to 6 months after employment ends or in the event of an un- successful employment application. (Screening and Right to work checks - two years after employment ends).
Employment details (including name, title, address, DOB, gender to enable the routine screening for adverse media and or industry vulnerabilities (such as Social Responsibility and Harm Minimalisation factors).	Administration of the contract on an ongoing basis throughout the life-cycle of your employment to ensure that we are upholding the statutory obligations imposed upon us, whilst maintaining a safe and secure working environment.	Legal obligation Performance of the contract. In our legitimate interest to maintain relevant and appropriate records.	During employment and up to - two years after employment ends.
Payroll, tax/NI and bank details.	Paying you, deducting tax and NI as appropriate, keeping appropriate records.	Legal obligation Performance of the contract	Payroll/tax/NI: Six years from the end of the financial year in which payments are made. Bank details: During employment and up to 6 months after employment ends.

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Working hours and arrangements.	Paying you correctly. Complying with legal requirements regarding Working Time Regulations, Managing attendance, day to day operational management and dealing with requests to alter hours.	Legal obligation. Performance of the contract. In our legitimate interest to manage working hours/ arrangements to ensure effective business operations.	During employment and up to 6 months after employment ends.
Pay and benefits including pensions (and information necessary to administer these) and expenses.	Providing you with agreed pay, benefits and expenses; making decisions about future compensation; tracking and reviewing pay, benefits, expenses; making strategic decisions about compensation; auditing and reporting on company financial position and paying over benefits to relevant providers.	Legal obligation. Performance of contract. In our legitimate interest to analyse pay, benefits and expenses and make decisions about appropriate compensation on an individual and company level.	During employment and up to 6 years after employment ends. Pension data is retained for 12 years.
Performance and career progression (including appraisals, performance management, target/objective setting, consideration of new duties/roles).	Ensuring you perform in accordance with your contract and to the standards we require; considering future duties/roles; setting performance-related pay increases; determining eligibility for performance bonuses.	Performance of the contract In our legitimate interest to manage performance and duties/roles to ensure effective business operations and set appropriate levels of remuneration.	During employment and up to 6 months after employment ends
Qualifications (including educational, vocational, driving licences, PML, AML where appropriate) and training.	Ensuring you are appropriately qualified and trained for current or potential roles.	Legal obligation. Performance of the contract. In our legitimate interest to ensure that you have appropriate qualifications and training for your current or potential future roles.	During employment and up to 6 months after employment ends.
Holidays and other leave.	Managing statutory and non-statutory holiday and other leave.	Legal obligation. Performance of contract. In our legitimate interest to ensure leave taken is compatible with our business requirements and that any consequent operational adjustments are made.	During employment and up to 6 years after employment ends.

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Disciplinary, conduct and grievance matters about you or involving you.	Investigating and dealing with disciplinary, conduct and grievance matters related to you or otherwise involving you.	Legal obligation. Performance of the contract. In our legitimate interest to deal effectively with disciplinary, conduct or grievance matters whether you are the subject of them or are otherwise connected to the issues raised. Public interest in detecting or preventing unlawful acts.	During employment in accordance with our disciplinary and grievance policies, and up to 12 months after employment ends.
Employee representation.	Establishing and facilitating consultation with staff forum/trade union on relevant matters.	Legal obligation In our legitimate interest to engage with appropriate Employee representatives on relevant matters	During employment and up to 6 months after employment ends.
Health and safety.	Conducting risk assessments; establishing safety measures to mitigate identified risks; providing a safe working environment; keeping required records; return to work interviews, incident reports, <i>Riddor</i> cases, relevant risk assessments.	Legal obligation. In our legitimate interest to ensure Employees are able to perform their duties in a safe environment for the efficient operation of the business.	Decided on a case by case basis in accordance with the criteria set out in this Notice, in particular any legal requirement to retain particular record.
Changing terms of employment or termination of employment.	Administration of the contract, making changes to the terms of employment to fit business requirements; managing our relationship with you on an ongoing basis including during notice; promotions, role changes, flexible working and other career progression; termination of the working relationship whether instigated by us or you; managing post-employment issues	Legal obligation. Performance of the contract. In our legitimate interest to manage, alter and, where relevant, to terminate the contractual relationship or respond to resignations and to deal effectively with post-employment issues.	During employment and up to 6 years after employment ends.
Identifying images (Still and live).	Live video streaming upon the Les A online gaming platform. Internal broadcasting upon electronic platforms. For example, Staff Notice Boards and WICKR.	In our legitimate interests of providing the on-line gaming service, (with facilities in place for you to withdraw consent, in part or wholly at any time). In some instances, the legal ground is the performance of the contract.	During employment and up to 1 year after employment ends.
CCTV footage, including Facial Recognition. (within the casino,	Primarily for security purposes, although we may also use CCTV footage when	Legal obligation.	The standard CCTV archiving is up to 60 days. Any subsequent

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audio is also collected as part of the surveillance footage).	investigating allegations of misconduct by Employees. Such monitoring may be conducted in forms, both overt and covert.	Performance of the contract. In our legitimate interest to deal effectively with allegations of misconduct and to maintain the security of our premises.	archiving of CCTV incidents or investigations are subject to a full 5-year period and extended thereafter if relevant to the pursuance of legal enquiries / investigations.
Information about your use of business equipment, technology and systems including our computers/ telephones/mobile phones/ software/ applications/ social media/ door entry systems/clocking in-out systems/time recording /performance output monitoring.	Maintaining the operation, security and integrity of our business communications systems (e.g. protection from hackers, malware, etc.); providing IT and communications systems support; preventing excessive personal use; recording communications with customers for quality control and training purposes and dispute resolution, keeping premises secure; managing time; recording rate of work/efficiency of work.	Performance of the contract. In our legitimate interest to maintain operation, security and integrity of communications systems, prevent excessive use of business resources for personal purposes, and monitor and maintain quality of communications with customers; record time worked and rate/efficiency of work.	One year from date of last activity.
Personal data produced by you and others in the course of carrying out your job (e.g. job-related emails, minutes of meetings, written reports, business social media presence etc.).	Performance of job duties by you and your colleagues; carrying on the business of the company; monitoring your business social media presence to ensure you comply with standards expected.	Performance of the contract In our legitimate interest to carry out the company business.	Decided on a case by case basis in accordance with the criteria set out in this Notice
Personal data, which may include any of the types of data set out in this Appendix, that is relevant to our strategic decision-making processes, to planning business operations, actual and potential legal claims, corporate reporting and business risk analysis.	To enable us to carry out the company business, analyse current business performance, plan for the future, present information in reports to relevant audiences such as shareholders, protect the company from legal claims, seek professional advice as and when required in the course of running our business.	Legal obligation. Performance of the contract. In our legitimate interest to carry out the company business, including taking strategic decisions in the interest of the business, communicating about the business with relevant audiences and seeking professional advice where appropriate.	Decided on a case by case basis in accordance with the criteria set out in this Notice.